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14	UNITED STATES DISTRICT COURT						
15	DISTRICT O	F NEVADA					
16	* * LHF PRODUCTIONS, INC., a Nevada	* CASE NO. 2:16-cv-02028-JAD-NJK					
17	Corporation, Plaintiff,	STIPULATION AND ORDER TO					
18	VS.	EXTEND BRIEFING DEADLINES ON PLAINTIFF LHF					
	AGUSTIN BERTOLIN, an individual; MARIA	PRODUCITONS, INC.'s MOTION					
19	GONZALEZ, an individual; BRIAN KABALA, an individual; JOHN KOEHLY, an individual;	TO VOLUNTARILY DISMISS WITH PREJUDICE ITS CLAIMS AGAINST					
20	DANIEL O'CONNELL, an individual; DONALD PLAIN, an individual; DAVID	BRIAN KABALA [ECF No. 174] AND MOTION TO DISMISS					
21	POOR, an individual; ANTE SODA, an individual; MATTHEW STEWART, an	DEFENDANT BRIAN KABALA'S DECLARATORY JUDGMENT					
22	individual; AARON TAKAHASHI, an individual; and JOHN AND JANE DOES, 1-10,	COUNTERCLAIM FOR LACK OF SUBJECT MATTER JURISDICTION					
23	Defendants.	[ECF No. 175]					
24							
25	BRIAN KABALA, an individual,	[FIRST REQUEST]					
26	Counter-Plaintiff, vs.	[DODAY 174]					
27	LHF PRODUCTIONS, INC., a Nevada	[ECF No. 176]					
28	Corporation, Counter-Defendant.						

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STIPULATION AND ORDER TO EXTEND BRIEFING DEADLINES ON PLAINTIFF LHF PRODUCITONS, INC.'s MOTION TO VOLUNTARILY DISMISS WITH PREJUDICE ITS CLAIMS AGAINST BRIAN KABALA [ECF No. 174] AND MOTION TO DISMISS DEFENDANT BRIAN KABALA'S DECLARATORY JUDGMENT COUNTERCLAIM FOR LACK OF SUBJECT MATTER JURISDICTION [ECF No. 175]

## [FIRST REQUEST]

COMES NOW Plaintiff LHF PRODUCTIONS, INC. ("LHF" or "Counter-Defendant") and Defendant BRIAN KABALA ("Kabala" or "Counter-Plaintiff"), by and through their respective counsel of record, and hereby stipulate and agree to extend the time for Kabala to file responses to LHF's Motion to Voluntarily Dismiss With Prejudice its Claims Against Brian Kabala [ECF No. 174] and LHF's Motion to Dismiss Defendant Brian Kabala's Declaratory Judgment Counterclaim for lack of Subject Matter Jurisdiction [ECF No. 175], (the "Motions to Dismiss"), agreeing as follows:

- 1. On August 13, 2018, LHF filed the above referenced Motions to Dismiss (ECF. Nos. 174 and 175). Per LR 7-2 Kabala's responses are due by August 27, 2018.
- 2. LHF and Kabala now hereby stipulate to extend the deadline for Kabala to respond to the Motions to Dismiss to September 6, 2018.
- 3. The deadline for LHF to file its reply briefs, if any, shall be similarly extended by ten days, from September 7, 2018, to September 17, 2018.
  - 4. This is the **First Request** for an extension on these deadlines.
- 5. This request is made for good cause, in good faith, and not made for the purpose of undue delay. Neither party will be prejudiced by the requested extension.

### **GOOD CAUSE STATEMENTS**

6. Kabala seeks additional time to respond to the Motions to Dismiss, noting that the Motions to Dismiss were filed on August 13, 2018, the day Defendant's lead counsel, Lisa Clay, Esq., returned to the office from vacation. Upon her return, she has been preparing for two major depositions in this case, set to take place on August 29, 2018 and August 30, 2018. She is also in the final stages of finalizing two time-sensitive motions in this case. Preparing for these depositions, as well as finalizing these two motions, in addition to work in an estimated 15 other 1

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active matters, will make it extremely difficult to adequately review and respond to these two significant motions to dismiss without an extension.

Based on Counsel's current case load, related to both this matter and general work 7. load, approximately ten additional days will be needed to review and respond to the Motions to Dismiss.

WHEREFORE, subject to the Court's approval below, Counter-Defendant LHF and Counter-Plaintiff BRIAN KABALA hereby stipulate and agree to extend the deadline for Kabala to respond to the Motions to Dismiss from Monday, August 27, 2018 to September 6, 2018, and LHF's deadline to file its Reply briefs from September 7, 2018 to September 17, 2018.

Respectfully submitted August 20<sup>th</sup> 2018.

## WEIDE & MILLER, LTD.

By:/s/ F. Christopher Austin, Esq. F. CHRISTOPHER AUSTIN, ESQ. Nevada Bar No. 6559 10655 Park Run Drive, Suite 100 Las Vegas, Nevada 89144

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Attorney for Defendant, Brian Kabala

#### **ORDER**

Based on the parties' stipulation [ECF No. 176) and good cause appearing, IT IS HEREBY ORDERED that the deadline for the Kabala to respond to the Plaintiff's pending 

Motions to Dismiss is hereby	extended to	September	6,	2018,	and	LHF'	S	deadline	to	file	its
Reply briefs is hereby similarly	y extended to	September	17,	2018.							

## IT IS SO ORDERED.

DATED this _	21	_day of _	August	, 2018.
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UNITED STATES DISTRICT JUDGE